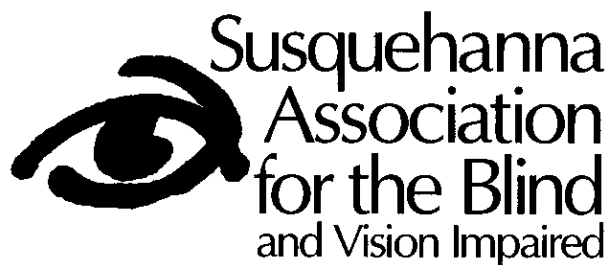


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February 7, 2005

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Mr. John Heyer, General Counsel
Committee for Purchase from People
Who Are Blind or Severely Disabled
1421 Jefferson Davis Highway
Jefferson Plaza 2, Suite 10800
Arlington, VA 22202-3259

Re: Docket No. 2004-01-01; Governance Standards for Central
nonprofit Agencies and Nonprofit Agencies Participating in the Javits-
Wagner-O'Day Program Notice of Proposed Rulemaking and
Request for Comments; 69 Fed. Reg. 65395 (November 12, 2004)

Dear Mr. Heyer:

We appreciate the opportunity to provide comments in regards to the
proposed governance standards pertaining to nonprofit agency
governance and executive compensation.

The Susquehanna Association for the Blind and Vision Impaired
(SABVI) has provided charitable rehabilitation services to blind and
vision-impaired citizens of Lancaster and Lebanon Counties,
Pennsylvania, for nearly 80 years. For the past 30 years, it has
provided employment opportunities and job training for blind persons
through commercial contracts, the Pennsylvania Industries for the
Blind and Handicapped, and the Javits-Wagner-O'Day program.

Our employment programs were originally created in the sheltered
workshop mold, but in the past 15 years, we have evolved into an
efficient light industry that provides our employees with wages and
benefits that often exceed those of comparable commercial
employers in our region – and certainly, with jobs they are unlikely to
find elsewhere.

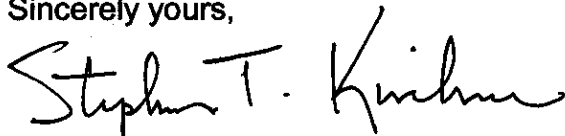
We are very proud of our accomplishments in both the rehabilitation and employments sides of our house. It has taken strong professional management operating under the diligent governance of our community-based Board of Directors to bring us to this point. We are reluctant to turn over the governance of this fine organization to a federal agency, and that, in the end, is what the proposed rulemaking will do.

We have read with interest many of the comments submitted thus far, and we thank the Committee for Purchase for making these readily available on its website. We will not waste the Committee's time with further recitation of the arguments made so eloquently by many of our colleagues. We believe the issue of executive compensation itself to be a matter of governance and we interpret its isolation in the rulemaking to be a political strategy without material merit. Beyond that, let it be enough to say that we concur in the main with the comments made by the NAEPB, the Seattle Lighthouse, Peckham, Inc., and Goodwill International. In short, we find the rulemaking to be intrusive, excessive, duplicative, and wasteful of financial and human resources, and well outside the Committee's legislated mandate.

We have no quarrel with the idea that the public and the federal customer have a right to assurances that agencies operating under the auspices of the JWOD Act are operating legally and ethically. That is why non-profit law requires that boards of directors of non-profit organizations be volunteer representatives of the communities in which they operate. Implicit in this is the understanding that these people, acting as a body, will protect and advance their community's interests before their own or those of their managing employees. The primary role of boards like ours, then, *is* governance; and in this regard, the alleged failure of a scant percentage of agencies in this program is not cause for alarm – *rather, it should be taken as proof that the system is working quite well.* We encourage referral of these aberrations to the proper authorities and we urge the Committee for Purchase to withdraw this rulemaking and return its efforts to the important work of facilitating employment of people who are blind or disabled.

Thank you again for the opportunity to comment,

Sincerely yours,

A handwritten signature in black ink, reading "Stephen T. Kirchner". The signature is fluid and cursive, with the first name "Stephen" and last name "Kirchner" clearly legible.

Stephen T. Kirchner, Chairman
Board of Directors

c: Ms. Katherine Astrich
Office of Management and Budget
Office of Information and Regulatory Affairs
Eisenhower Executive Office Building
725 17th Street, N.W.
Washington, D.C. 20506-0001